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*Attorney for Defendant
Cronometer Software, Inc.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ESHA RESEARCH, INC., now known as
TRUSTWELL,

Plaintiff,

vs.

CRONOMETER SOFTWARE, INC.,
formerly known as **BIGCRUNCH**
CONSULTING, LTD., and **DOES 1-20**,

Defendants.

No. 3:24-cv-01586-AB

**DECLARATION OF NIKA ALDRICH IN
SUPPORT OF CRONOMETER
SOFTWARE, INC.'S MOTION TO
COMPEL**

I, Nika Aldrich, declare as follows:

1. I am the attorney of record in this matter for Defendant, Cronometer Software, Inc. ("Cronometer"). I make this declaration based upon my personal knowledge in support of Cronometer's Motion to Compel.

2. Attached hereto as Exhibit 10 is a true and accurate copy of the answers to Interrogatory No. 2 that Plaintiff provided in this case. Pursuant to Plaintiff's marking its answer Confidential, the exhibit is being filed under seal.

3. Included on a USB drive supplied to the Court as Exhibit 11 is a folder containing the March 2022 database files provided to me by Aaron Davidson. This data was provided as CSV files, or files with data separated by commas. The file labeled “Data” contains the nutrition data, with each line in the database correlated to a reference number “RefNum.” The other files correlate the “RefNum” with the name of the food, the brand name, and the serving size. Plaintiff maintains that the database is Confidential; therefore, the exhibit is being filed under seal.

4. For the convenience of the Court, I have also included as Exhibit 12 an Excel spreadsheet, which compiles the data from the separate CSV files into a single spreadsheet for ease of readability. The Nature Valley Maple Brown Sugar granola bar used as an example in the brief can be found in row 24299, in close proximity to Metamucil, Folgers coffee, Taco Bell chips, and Mountain Dew. Plaintiff maintains that the database is Confidential; therefore, the exhibit is being filed under seal.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on March 18, 2025, in Seattle, Washington.

s/ Nika Aldrich
Nika Aldrich